

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

KAREN S. ROWLAND,

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC.;

MRS BPO, L.L.C.;

CONVERGENT OUTSOURCING, INC.;

NATIONAL COLLEGIATE STUDENT
LOAN TRUST 2006-4;

NATIONAL COLLEGIATE STUDENT
LOAN TRUST 2007-4; and

U.S. BANK NATIONAL ASSOCIATION,

Defendants.

Civil Action No. 3:23-cv-258
Hon. M. Hannah Lauck

**TRANSWORLD SYSTEMS INC., CONVERGENT OUTSOURCING INC., AND MRS
BPO, L.L.C.'S MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendants, Transworld Systems Inc., Convergent Outsourcing, Inc., and MRS BPO, LLC, submit this Motion to Dismiss the Amended Class Action Complaint (Doc. 10) filed by plaintiff, Karen Rowland. TSI, COI, and MRS respectfully request the Court dismiss Plaintiff's Amended Class Action Complaint pursuant to Fed. R. Civ. P. 12(b)(6). A Memorandum in Support of this Motion, detailing the law and facts that entitle movants to the requested relief is submitted herewith.

Dated: September 8, 2023

Respectfully submitted,

/s/ William D. Bayliss

William D. Bayliss, Esq.
Virginia Bar No. 13741
Joseph E. Blackburn, Esq.
Virginia Bar No. 81871
WILLIAMS MULLEN
200 South 10th Street, Suite 1600
P.O. Box 1320 (23218)
Richmond, VA 23219
Telephone: (804) 420-6459
Facsimile: (804) 420-6507
bbayliss@williamsmullen.com
jblackburn@williamsmullen.com

Bryan C. Shartle, *Pro Hac Vice Pending*
Justin H. Homes, *Pro Hac Vice Pending*
Bradley J. St. Angelo, *Pro Hac Vice Pending*
SESSIONS, ISRAEL & SHARTLE, LLC
3838 North Causeway Blvd, Suite 2800
Metairie, LA 70002-7227
Telephone: (504) 828-3700
Facsimile: (504) 828-3737
bshartle@sessions.legal
jhomes@sessions.legal
bstangelo@sessions.legal

*Counsel for Transworld Systems Inc., Convergent
Outsourcing, Inc., and MRS BPO, L.L.C.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of September, 2023, a copy of the foregoing was filed electronically via the Court's CM/ECF system. Notice of this filing will be sent to all parties of record by operation of the Court's electronic filing system.

/s/ William D. Bayliss
William D. Bayliss, Esq.